

Robert T. Mills (Arizona Bar #018853)
Sean A. Woods (Arizona Bar #028930)
MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
Telephone 480.999.4556
docket@millsandwoods.com
swoods@millsandwoods.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Eastern Industries, LLC, a New York
limited liability company,

Plaintiff,

vs.

EarthCo Enterprises, LLC, an Arizona
limited liability company; Thomas Vella
and Jane Doe Vella, husband and wife,
Wesley Zlotoff and Jane Doe Zlotoff,
husband and wife; Dominic Riccobono
and Jane Doe Riccobano, husband and
wife, and Jack Thomas Riccobono and
Jane Roe Riccobono, husband and wife,
Scott Williams and Jane Doe Williams,
husband and wife,

Defendants.

Case No.: 2:23-cv-00109

**STIPULATION TO EXTEND
DEADLINES**

(Fourth Request)

(Assigned to the Honorable Susan M.
Brnovich)

Through undersigned counsel and pursuant to Local Rule 7.3, the parties hereby stipulate and agree to extend the remaining deadlines by approximately sixty days each, all in accordance with the [Proposed] Order attached hereto.

Good cause exists for such an extension. The documents produced have been voluminous, and Plaintiff requires additional time to complete its review of them. Moreover, the large size of the production will inevitably necessitate additional discovery in response.

1 Accordingly, the parties stipulate and agree to extend the following dates and
2 deadlines as follows:

3 1. The last day to complete fact discovery, from June 30, 2025 to **August 29,**
4 **2025;**
5

6 2. The last day to file dispositive motions, from August 29, 2025 to **October**
7 **29, 2025;**
8

9 3. The Telephonic Trial Setting Conference, from September 12, 2025 at 8:45
10 a.m. to a date and time approximately sixty days later to be set by the Court.

11 **RESPECTFULLY SUBMITTED** this 30th day of June 2025.

12 **MILLS + WOODS LAW, PLLC**

13
14 By /s/ Sean A. Woods
15 Robert T. Mills
Sean A. Woods
16 5055 North 12th Street, Suite 101
Phoenix, AZ 85014
17 *Attorneys for Plaintiff*

18
19 **WARNER ANGLE HALLAM JACKSON &**
20 **FORMANEK PLC**

21 By /s/ Peter J. Foster (w/ permission)
22 Sandra E. Portney
Peter J. Foster
23 James Valletta
2555 E Camelback Rd., Ste. 800
24 Phoenix, AZ 85016
(602) 264-7101
25 *Attorneys for Defendants*
26
27
28

MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, AZ 85014
480.999.4556

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Sandra E. Portney

sportney@warnerangle.com

landrosiuk@warnerangle.com

Peter J. Foster

pfoster@warnerangle.com

ebailey@warnerangle.com

lmazza@warnerangle.com

James Valletta

jvalletta@warnerangle.com

WARNER ANGLE HALLAM JACKSON & FORMANEK PLC

2555 E Camelback Rd., Ste. 800

Phoenix, AZ 85016

(602) 264-7101

Attorneys for Defendants

/s/ Ben Dangerfield